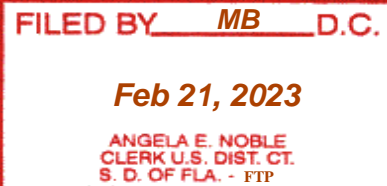


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-MJ-00016-SMM



UNITED STATES OF AMERICA,

v.

VALLE VINSENT LAITINEN and
JUDITH LAIR TEATER

Defendants.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia Valle)? No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No
3. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

BY: /s/ Luisa Honora Berti

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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America)

v.)

Case No.)

VALLE VINSENT LAITINEN and)
JUDITH LAIR TEATER)

23-MJ-00016-SMM)

*Defendant(s)*FILED BY MB D.C.**Feb 21, 2023**ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTP

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

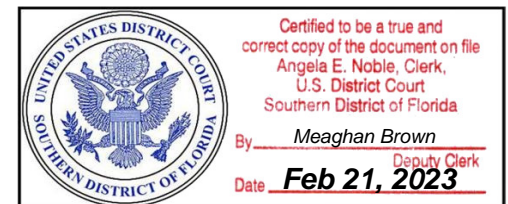
On or about the date(s) of August 20, 2020 in the county of Martin County in the
Southern District of Florida, the defendant(s) violated:*Code Section*

8 U.S.C. § 1325(c)

Offense Description

Marriage Fraud

This criminal complaint is based on these facts:



-SEE ATTACHED AFFIDAVIT-

☒ Continued on the attached sheet.

Complainant's signature

Michael Jarel, Special Agent, HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by videoconference.

Date: February 21, 2023

Judge's signature

City and state: Fort Pierce, Florida

Shaniek M. Maynard, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michel Jarel, after being duly sworn, depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I, Michel Jarel, am a Special Agent ("SA") with the Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI"), where I have been employed since June 2016. I am a graduate of the Federal Law Enforcement Training Center ("FLETC"), Glynco, Georgia. At FLETC, I was trained in, among other things, criminal investigative techniques, and export-control investigations, among other topics. Prior to my employment with HSI, I was employed as a Border Patrol Agent with the United States Border Patrol ("USBP") from January 2011 to June 2016, and I attended the USBP Basic Academy at the Federal Law Enforcement Training Center in Artesia, New Mexico. As a Border Patrol Agent, I was assigned to the Douglas Station, located in the Tucson Sector, where I patrolled the international border between the United States and the Republic of Mexico to prevent the entry of aliens, contraband, and terrorists and to arrest those who were in violation of any other applicable federal law.

2. During my career, I have participated in, and directed criminal investigations involving human smuggling and human trafficking. I have received formal training and extensive on-the-job experience and training in the laws and regulations relating to human smuggling and human trafficking. I have investigated human smuggling offenses, and I have conducted investigations of criminal acts involving violations of 8 U.S.C. § 1324(a)(1)(A)(v)(I) (conspiracy to bring aliens into the United States), 8 U.S.C. § 1324(a)(2)(B)(ii) (bringing aliens for commercial profit and or private gain), 8 U.S.C. § 1325(c) (marriage fraud), and 8 U.S.C. 1324(a)(2) (bringing aliens to the United States).

3. I am conducting an investigation regarding marriage fraud and related activities of the individuals named herein, Valle Vinsent LAITINEN and Judith Lair TEATER. I am familiar with the facts and circumstances surrounding this investigation from my own investigative efforts, as well as from information obtained from other law enforcement officers with personal knowledge of the evidence and activities described herein. Although familiar with the facts and circumstances of this investigation, I have not included each and every fact known to me about the matters set forth herein, but only those facts that I believe are necessary to establish probable cause to believe that Valle Vinsent LAITINEN and Judith Lair TEATER violated 8 U.S.C. §§ 1325(c) (marriage fraud).

PROBABLE CAUSE

4. On April 30, 2022, Daniel CROW was referred for inspection after arriving at the Philadelphia International Airport from the London International Airport, aboard American Airlines flight AA737. Due to CROW's involvement in child exploitation, CROW's iPhone was detained for a border search and shipped to HSI Ft. Pierce.

5. On May 05, 2022, SA Brian Ray, HSI Ft. Pierce, forensically extracted data from CROW's iPhone, including text messages between him and one of his girlfriends, Judith TEATER. While reviewing the messages, SA Brian Ray noted discussions between CROW and TEATER regarding a scheme for TEATER to fraudulently marry a friend of CROW's, Finnish national Valle Vinsent LAITINEN, for the purpose of obtaining an immigration benefit for LAITINEN.

6. During a chat with CROW on June 14, 2020, TEATER indicated LAITINEN had proposed. CROW asked if LAITINEN gave her a car. TEATER replied, "I clarified there would NEVER be anything physical between us. That's just awkward," followed by, "No he didn't give me a car, he doesnt even have his own lmao." CROW responded, "Guess he don't want that green card, then," followed by, "Nigga got pay." TEATER responded, "Oh i'll get paid fo sho."

7. CROW asked if TEATER would go through with the marriage and she replied, "I dont know, it's not like I'm seeing anyone or even want to anytime soon. Definitely dont want marriage from anyone. It helps him, and I can get extra money too. Those are the pros." CROW responded, "Not 'extra' gotta think big: Iv heard stories people paying 40-50K." TEATER replied, "Paying 40k for what? Divorce?" CROW said, "Marriage", followed by, "Green card." TEATER then said, "Technically he has to stay married for 2yrs to get his green card and here in U.S after 2yrs whatever is earned is half especially if he earned it bc of the marriage. Ijs he has way more to lose. I just get a divorce on my file and that's it." TEATER indicated she would conduct research and typed, "He wont make money unless he marrys me." TEATER messaged CROW, "He has researched a lot apparently. Lol I'm scared to, I dont want it on my search log or history."

8. Over the following months, TEATER and CROW exchanged numerous messages regarding the fraudulent marriage. During a chat on June 27, 2020, TEATER told CROW she was going out with LAITINEN and needed to figure out how to approach LAITINEN regarding financial support. CROW replied, "If u truly want me to... I will but we need to talk about deteails." After returning from her night out with LAITINEN, TEATER told CROW, "Tinder rando coming over." The messages indicated TEATER then had sexual intercourse with a stranger while CROW watched via a web camera in TEATER's apartment, supporting the fact that TEATER and LAITINEN never actually had a romantic relationship.

9. On July 23, 2020, TEATER complained that LAITINEN was attempting to rush her into committing the immigration fraud, telling CROW, "[h]e waits till last minute to do things so it's been throwing me off all fucking week. Doesn't say anything until the moment it needs to be done by." CROW responded, "What needs to be done?" TEATER responded, "Just stuff for petition, and some that are unnecessary in my opinion." The two continue to chat into July 24, 2020, with CROW

inquiring, "Petition?" TEATER then responds with, "Fiance visa..." CROW says, "Oh – that was fast . . . Thought you were still hashing out the details," to which TEATER responds, "Exactly."

10. On August 9, 2020, TEATER told CROW that LAITINEN wanted to change the process and now apply for a spousal visa which would allow him to work immediately (or so they believed). TEATER explained that this was versus a fiancé visa which would not permit LAITINEN to work until after the marriage.

11. During a text exchange on September 4, 2020, TEATER messaged CROW about LAITINEN saying, "Your friend is a lazy bum btw! Doesn't lift a finger or help in any way. I'm getting the feeling he doesn't plan on doing much financially for me. He leaves the 15th. He booked it as soon as we finalized the marriage." CROW replied, "Well.... I hope u plan to get it all on paper... if he renigs you can turn him in". TEATER responded, "Oh im thinking more of just filing divorce. Getting it on paper is incriminating for me as well."

12. On September 12, 2020, TEATER messages CROW that she was not going to do any more favors for LAITINEN and that he needed to sign a contract. She tells CROW that LAITINEN has offered her \$20,000 over three years. CROW tells her he thinks this amount is too low. TEATER says that LAITINEN told her if she wanted more money he would have to pay her over a longer period of time.

13. According to SA Brian Ray, he conducted open-source record checks on the Martin County Clerk of Court, locating a Marriage Record for Judith TEATER and Valle LAITINEN. The Marriage Record indicated TEATER and LAITINEN were married by a Deputy Clerk of Court in Martin County on October 12, 2020.

14. After the marriage, the chat indicates TEATER got mad at LAITINEN for going through papers on her desk. On September 11, 2020, CROW asked if TEATER was going home and

she replied, "No...when I'm there I'm extremely uncomfortable. Seeing him on camera going through my papers made me realize I do not know him, nor what he is capable of...which then caused extreme anxiety, sleepless nights, and my PTSD to be triggered."

15. Additionally, HSI SA Brian Ray located chat messages between CROW and LAITINEN. At 7:36 PM on September 16, 2020, LAITINEN texted CROW, "What's happening boss" followed by, "Leaving the US in a few hours."

16. On February 21, 2023, HSI SA Brian Ray relayed this information and I conducted records checks of CBP systems and learned LAITINEN departed the United States on a flight leaving JFK International, New York, at 9:00 PM on September 16, 2020.

17. Additional review of messages by HSI SA Brian Ray and I indicated that messages between CROW and LAITINEN do not mention the marriage scheme until after LAITINEN's departure from the United States on September 16, 2020. On November 16, 2020, LAITINEN was discussing his plans, "Given the developments we discussed before, or lack thereof rather." CROW replied, "Developments?" LAITINEN explained, "The fact the Judy flaked out after we got legally married." CROW asked, "Can u still capitalize on the marriage?" followed by "Citizenship & employment." In a series of messages, LAITINEN said, "No because she didn't send any paperwork in for whatever unexplainable reason . . . All was done and ready to be signed by her and sent in. Flaked . . . Married on paper to a person who doesn't reply to me. Now neither getting anything out of it. Speechless."

18. On May 23, 2022, CROW was arrested for unrelated child exploitation crimes. TEATER arrived on scene and spoke to SA Eric Urgo, providing her phone number, XXX-XXX-7488, the same number from which the above messages were sent.


19. Based on the foregoing facts and information, I respectfully submit that probable cause exists to believe that Valle Vinsent LAITINEN and Judith Lair TEATER violated Title 8, United States Code, Section 1325(c), marriage fraud.

INFURTHER YOUR AFFIANT SAYETH NAUGHT.



Michel Jarel
Special Agent
Homeland Security Investigations

Sworn to before me, by video conference, in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedure, this 21st day of February 2023.



Shaniek M. Maynard
United States Magistrate Judge